

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :

- v. - :

FRAIDA HICKSON, :

Defendant. :

INFORMATION

19 Cr. 293 (KMK)

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COUNT ONE

The United States Attorney charges:

1. On or about March 27, 2017, in the Southern District of New York, FRAIDA HICKSON, the defendant, knowingly, and with intent to defraud, in an offense affecting interstate commerce, did effect and attempt to effect transactions, with one and more access devices issued to another person and persons, to receive payment and other things of value during a one-year period the aggregate value of which is equal to and greater than \$1,000, to wit, without any authorization to do so, FRAIDA HICKSON, the defendant, arranged to be added as an authorized user to a CareCredit account in the name of another person, without that person's consent, and used the account to purchase goods and services in an amount totaling more than \$1,000 during a one-year period.

(Title 18, United States Code, Sections 1029(a)(5) & 2.)

FORFEITURE ALLEGATION

2. As a result of committing the offense alleged in Count One of this Information, FRAIDA HICKSON, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1029(c)(1)(C), any and all property constituting, or derived from, proceeds obtained directly or indirectly, as a result of the commission of said offense, and any and all personal property used or intended to be used to commit said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision


3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property

of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982, 1029;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(18 U.S.C. § 1029(a)(5) and 2.)

GEOFFREY S. BERMAN
United States Attorney
